# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Beachbody, LLC and Sagi Kalev,

Plaintiffs, : Civil Action No.:

v. : JURY TRIAL DEMANDED

Richard J. Wyant d/b/a Muscle Labs USA a/k/a Legal Steroids USA a/k/a, Orderlegalsteroids.com,

Defendant.

etendant.

### **COMPLAINT**

Plaintiff, Beachbody, LLC ("Beachbody") and Sagi Kalev ("Mr. Kalev") (collectively, "Plaintiffs"), by and through their undersigned attorneys, for their complaint against Defendant, Richard J. Wyant d/b/a Muscle Labs USA a/k/a Legal Steroids USA a/k/a Orderlegalsteroids.com ("Defendant" or "Muscle Labs"), allege as follows:

### **Parties**

- Beachbody is a Delaware limited liability company with an office at 3301
   Exposition Blvd., Santa Monica, CA 90404.
- 2. Mr. Kalev is a resident of Dallas, Texas, with a residential address of c/o Thrive Institute, 4020 Oak Lawn Avenue, Dallas, TX 75219.
- 3. Defendant is an individual residing at 324 N. Bayshore Dr., Columbiana, Ohio, 44408 and does business under the aliases Muscle Labs USA, Legal Steroids USA and Orderlegalsteroids.com.

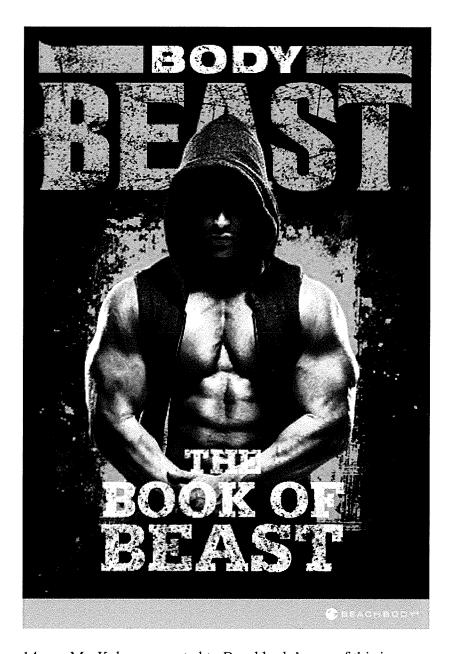
### Jurisdiction and Venue

- 4. This action arises under the Acts of Congress under the Lanham Act, Title 15 U.S.C. § 1051, et seq., the Copyright Act, Title 17 U.S.C. § 101, et seq. and the Commonwealth of Pennsylvania's Statutes. Therefore, this Court has subject matter jurisdiction under the provisions of Title 28 U.S.C. §§ 1331 and 1338 because this action involves federal questions of law.
- 5. This Court has original jurisdiction over the claims brought under federal law pursuant to 28 U.S.C. §§ 1331 and 1338(b) and 15 U.S.C. § 1121.
- 6. This Court has supplemental jurisdiction under the state law claims under 28 U.S.C. § 1367.
- 7. Defendant is subject to this Court's personal jurisdiction because, upon information and belief, he, (1) regularly solicits business from customers in this district, and (2) purposefully availed himself of this forum by sending infringing advertisements into this judicial district and, thus, should reasonably foresee being haled into court in this judicial district.
  - 8. Venue is proper in this judicial district pursuant to Title 28 U.S.C. § 1391(b).

### Background as to Beachbody's Business and its Intellectual Property and Mr. Kalev

- 9. Beachbody is a company involved in the marketing, advertising, promotion, sale and distribution of health, fitness, wellness and nutrition products and services, including various in-home fitness and weight loss DVD-based programs, meal replacement shakes, and dietary supplements.
- 10. Mr. Kalev is a famous bodybuilder and fitness model who is featured in Beachbody's BODY BEAST® exercise DVDs and related printed materials.

- 11. Beachbody's in-home fitness and weight loss products and services combine challenging DVD-based home fitness programs with easy-to-follow diet guidelines, nutritional supplements and an online support system. Its BEACHBODY® line of fitness products and services include, for example, the P90X® Extreme Home Fitness, INSANITY®, INSANITY THE ASYLUM®, and BODY BEAST® fitness programs and related products.
- 12. Beachbody is the source of and owns all intellectual property rights in and related to its BEACHBODY® line of fitness products and services. Beachbody is the exclusive manufacturer and worldwide distributor of BEACHBODY®-, P90X®- and other branded nutritional supplements, exercise DVD's and related services and products in connection with health, nutrition and fitness.
- 13. In connection with the sale, offering for sale, promotion and advertisement of Beachbody's BODY BEAST® exercise program, Beachbody utilizes a copyrighted image of Mr. Kalev, wearing a sleeveless hooded sweatshirt. A copy of this image is depicted below (the "Copyrighted Image"):



- 14. Mr. Kalev consented to Beachbody's use of this image, as well as Beachbody's use of Mr. Kalev's image in connection with the BODY BEAST® program and related materials.
- 15. Beachbody owns U.S. Copyright Reg. No. PA0001830304, which Copyright Registration encompasses 7 BODY BEAST® videodiscs and print material, including The Book of Beast, which depicts the Copyrighted Image. The works of authorship at issue in this registration were created in 2012 and this registration issued on August 14, 2012.

- 16. Beachbody has extended significant resources in publicizing the BODY BEAST® program and, as a result of such efforts, the Copyrighted Image has been widely distributed. Indeed, among other places, this image appears on Beachbody's own websites at <a href="http://www.beachbody.com/product/fitness\_programs/body-beast-workout.do?e=279330">http://www.beachbody.com/product/fitness\_programs/body-beast-workout.do?e=279330</a> and <a href="http://www.teambeachbody.com/en\_US/workout-routines/body-beast-workout">http://www.teambeachbody.com/en\_US/workout-routines/body-beast-workout</a>; and on Amazon at <a href="http://www.amazon.com/Body-Beast-DVD-Workout-Base/dp/B008HV9EGK/ref=sr\_1\_1?ie=UTF8&qid=1418413906&sr=8-1&keywords=body+beast.">http://www.amazon.com/Body-Beast-DVD-Workout-Base/dp/B008HV9EGK/ref=sr\_1\_1?ie=UTF8&qid=1418413906&sr=8-1&keywords=body+beast.</a>
- 17. In association with the BODY BEAST® program, Beachbody also offers for sale and sells a series of dietary and nutritional supplements that Beachbody proudly identifies as being "steroid-free".
- 18. These supplements were specially designed to work in conjunction with the BODY BEAST® program and include (1) BEACHBODY® M.A.X. Muscle Acceleration Xtreme Creatine; (2) BEACHBODY® Fuel Shot; (3) BEACHBODY® Super Suma; and (4) BEACHBODY® Hardcore Base Shake. These supplements are sold as standalone products or in kits that include the BODY BEAST® exercise program.
- 19. Beachbody and Mr. Kalev promote the BODY BEAST® program and the BEACHBODY® supplements as being steroid-free and as a natural way to build muscle mass and receive great results.

### Background as to the Defendant's Unlawful Conduct

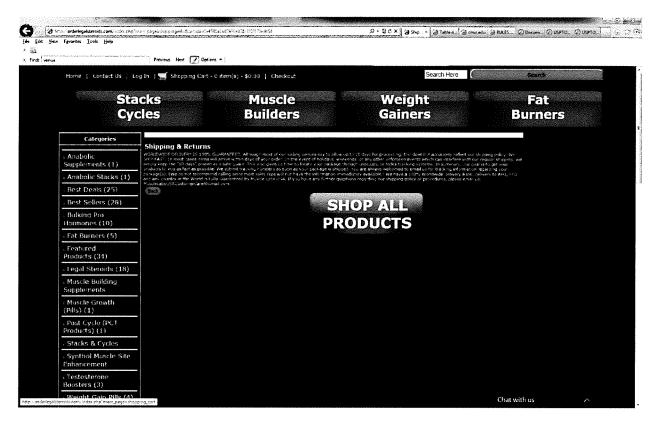
20. Defendant operates a business under the name of Muscle Labs USA a/k/a Legal Steroids USA a/k/a OrderLegalSteroids.com.

21. In or around the Summer or Fall of 2014, Defendant or one of its agents advertised in the September 2014 issue of *Flex* magazine the following advertisement ("Defendant's Advertisement"):



22. Under the "Shipping & Returns" section of the website at <a href="https://www.Orderlegalsteroids.com">www.Orderlegalsteroids.com</a> (the "Legal Steroids Website"), there is an email address for

Defendant, namely, <u>MuscleLabsUSACustomerCare@Gmail.com</u>:

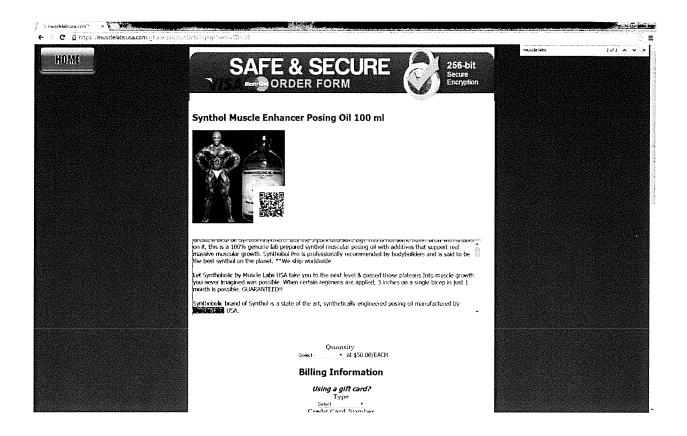


23. This email address is also associated with the domain musclelabsusa.com (the "Muscle Labs USA Website"), which website provides, in pertinent part:



## 24. The Muscle Labs USA Website at

https://musclelabsusa.com/gbase/productDetails.php?recordID=65 provides that the supplement Synthol Muscle Enhancer offered under the SYNTHOBOLIC brand name is "by Muscle Labs USA" and that it is a "synthetically engineered posing oil manufactured by Muscle Labs USA":



- 25. The U.S. Patent and Trademark database of registered marks includes U.S. Trademark Reg. No. 4179119 for SYNTHOBOLIC for "[b]ody oils; Cosmetic oils; Essential oils", owned by Richard J. Wyant. The specimen of record for this registration appears to identify an identical (or nearly identical) label as that depicted in the screenshot in paragraph 24. *See* website screenshots attached hereto as **Exhibit A**.
- 26. A third party website at <a href="www.ripoffreport.com">www.ripoffreport.com</a> confirms that Richard J. Wyant is behind the Orderlegalsteroids.com website. See a copy of this website attached hereto as <a href="Exhibit B">Exhibit B</a>.
- 27. Thus, it is plain that Defendant operates a business under the names Muscle Labs USA, Legal Steroids USA and Orderlegalsteroids.com and, upon information and belief, is responsible for creating Defendant's Advertisement.

- 28. Defendant's Advertisement depicts an exact duplicate of Beachbody's Copyrighted Image of Mr. Kalev and, along with such image, suggests that consumers can navigate to the links identified thereon to order "legal" steroids. Therefore, Defendant's Advertisement associates Mr. Kalev and Beachbody with the promotion and endorsement of steroids.
- 29. On December 3, 2014, Beachbody sent to Defendant via email to <a href="MuscleLabsUSACustomerCare@gmail.com">MuscleLabsUSACustomerCare@gmail.com</a> a cease-and-desist letter requesting that Defendant, among other things, immediately request retraction of and refrain from further using Defendant's Advertisement.
- 30. Defendant responded on December 3, 2014 stating that "[w]ithout a court order, no content, images, or promotional text on any websites, magazines or other advertisements, will be changed, removed, or altered in any way" and that Defendant would "not respond any further to correspondence regarding this matter."

# COUNT I COPYRIGHT INFRINGEMENT, 17 U.S.C. § 501 (By Plaintiff Beachbody only)

- 31. Beachbody repeats and re-alleges, and incorporates by reference, the foregoing paragraphs as though they were fully set forth at length herein.
  - 32. Before 2014, Beachbody created and published the Copyrighted Image.
- 33. The Copyrighted Image is an original work that may be copyrighted under United State law.
- 34. In 2012, Beachbody applied to the copyright office for a copyright registration in the BODY BEAST® videodiscs and associated print materials, which included the Copyrighted Image.

- 35. A registration issued on August 14, 2012 as Registration Number PA0001830304, covering the BODY BEAST® videodiscs and associated print material, including the Copyrighted Image.
- 36. Since 2012, Beachbody has either published or licensed for publication all copies of the Copyrighted Image in compliance with the copyright laws and has remained the sole owner of the copyright therein.
- 37. After the copyright registration issued, Defendant infringed Beachbody's copyright by creating and, thereafter, publishing, distributing or requesting the publication of Defendant's Advertisement in *Flex* Magazine. Defendant's Advertisement was copied largely from Beachbody's Copyrighted Image, and Defendant's Advertisement is substantially similar, if not nearly identical, to Beachbody's Copyrighted Image.
- 38. Given the extensive publication of the Copyrighted Image, Defendant had access thereto.
  - 39. Beachbody has notified Defendant in writing of the infringement.
- 40. Defendant has refused to cease publishing or causing to be published Defendant's Advertisement or otherwise infringing upon Beachbody's Copyrighted Image, in violation of Beachbody's copyright.
- 41. Defendant has willfully infringed upon Beachbody's Copyrighted Image and Defendant's actions have caused irreparable injury to Beachbody.
- 42. Beachbody's damages from the aforesaid unlawful actions of Defendant, to the extent ascertainable, have not yet been determined.
- 43. Beachbody is entitled to statutory damages of upwards of \$150,000 in light of Defendant's willful infringement of the Copyrighted Image.

44. Beachbody seeks attorney's fees and costs given the willful conduct of Defendant.

# COUNT II FEDERAL UNFAIR COMPETITION (By both Plaintiffs)

- 45. Plaintiffs repeat and re-allege, and incorporate by reference, the foregoing paragraphs as though they were fully set forth at length herein.
- 46. In light of Defendant's above-referenced actions, and Defendant's refusal to cease publishing or causing to be published Defendant's Advertisement or otherwise infringing upon Beachbody's Copyrighted Image, in violation of Beachbody's copyright, Defendant has engaged in unfair trade practices and unfair competition in connection with its publication and/or distribution of Defendant's Advertisement, thus causing irreparable damage to Beachbody.
- 47. Moreover, in light of Defendant's advertisement, distribution and use of Defendant's Advertisement bearing the Copyrighted Image of Mr. Kalev in a commercial advertisement in *Flex* magazine, Defendant has used in commerce an advertisement that misrepresents that Defendant's goods, including Defendant's competing dietary supplements, are somehow affiliated with Mr. Kalev, Beachbody or Beachbody's BODY BEAST® program when that, in fact, is not the case.
- 48. Furthermore, Defendant's Advertisement falsely misrepresents that Beachbody and/or Mr. Kalev, the spokesperson for Beachbody's BODY BEAST® program, somehow promotes or endorses the use of steroids, when that is, in fact, not the case.
- 49. To the contrary, Beachbody and Mr. Kalev pride themselves on the fact that the BODY BEAST® program is steroid free, and have made concerted efforts towards emphasizing the steroid-free nature of the BODY BEAST® program and related supplements to potential consumers, particularly given the negative stigma surrounding steroids in the health and fitness industry.

- 50. In light of Defendant's Advertisement, a significant number of the purchasing public will likely be misled into believing that (1) Defendant and/or Defendant's goods and services are somehow affiliated with Beachbody, Mr. Kalev and/or Beachbody's BODY BEAST® program; and (2) Beachbody and/or Mr. Kalev promote and/or endorse the use of steroids either alone or along with its BODY BEAST® exercise program when that, in fact, is not the case.
- 51. Defendant's actions were willful and were tailored to syphon off of Beachbody's and Mr. Kalev's goodwill.
- 52. Defendant's above-referenced activities are likely to cause great harm to Beachbody and Mr. Kalev and their respective reputations and goodwill.
- 53. In light of Defendant's actions, Defendant has unfairly competed with Beachbody and Mr. Kalev in interstate commerce to the substantial and irreparable injury of the public and to Beachbody, its business reputation, and goodwill. 15 U.S.C. § 1125.
- 54. The activities of Defendant complained of herein constitute willful and intentional tort, in derogation of Beachbody's and Mr. Kalev's rights.
- 55. Defendant's conduct has caused and, if not enjoined, will continue to cause irreparable damage to the rights of Beachbody and Mr. Kalev in their respective businesses, reputations, and goodwill.
- 56. Beachbody's and Mr. Kalev's damages from the aforesaid unlawful actions of Defendant, to the extent ascertainable, have not yet been determined.
- 57. Beachbody and Mr. Kalev seek attorney's fees and costs given the willful conduct of Defendant.

58. Beachbody and Mr. Kalev seek treble damages given the willful conduct of Defendant.

# COUNT III UNAUTHORIZED USE OF NAME OR LIKENESS- 42 Pa. Stat. § 8316

- 59. Mr. Kalev repeats and re-alleges, and incorporates by reference, the foregoing paragraphs as though they were fully set forth at length herein.
- 60. Mr. Kalev's likeness and image has acquired commercial value, as Mr. Kalev is a well-known bodybuilder and fitness trainer as a result of Mr. Kalev's investment of time, effort and money in promoting himself in this field.
- 61. Defendant used Mr. Kalev's image and likeness, without Mr. Kalev's written consent, in connection with a commercial advertisement, namely, Defendant's Advertisement, which advertisement promoted Defendant's own websites and steroid products.
- 62. Moreover, Defendant used Mr. Kalev's image and likeness in connection with the promotion of steroids, which has a negative connotation to the general public, especially to members of the bodybuilding community.
- 63. By associating Mr. Kalev with the promotion, advertisement, offering for sale and/or sale of steroids and otherwise using Mr. Kalev's image and likeness without authorization, Defendant's conduct has caused and, if not enjoined, will continue to cause irreparable damage to Mr. Kalev's image, likeness, reputation and goodwill.
- 64. Mr. Kalev's damages from the aforesaid unlawful actions of Defendant, to the extent ascertainable, have not yet been determined.

### PRAYERS FOR RELIEF

WHEREFORE, Plaintiffs pray for relief against Defendant as follows:

- 1. That the Court preliminary and permanently enjoin and restrain Defendant, its officers, directors, agents, employees, representatives and all persons in active concert or participation with it who receives actual notice of the injunction, by personal service or otherwise, from doing, abiding, causing or abetting any of the following:
  - (a) infringing or contributing to the infringement of the Copyrighted Image;
  - (b) engaging in any acts or activities directly or indirectly calculated to infringe upon Beachbody's Copyrighted Image;
  - (c) selling, offering for sale, promoting, advertising, marketing or distributing

    Defendant's products or services, signage, advertisements or marketing materials in a

    manner that unfairly competes with Beachbody or Mr. Kalev, including, but not limited
    to, (i) distributing or publishing Defendant's Advertisement or any other material bearing
    Beachbody's Copyrighted Image, Mr. Kalev's image or likeness or Plaintiffs' other
    respective intellectual property and, (ii) distributing or publishing any advertisement or
    marketing material tending to suggest that Beachbody and/or Mr. Kalev endorse or
    otherwise promote the use of steroids, whether "legal" or otherwise;
  - (d) using Mr. Kalev's name, image, likeness or other indicia of identity to promote or otherwise endorse Defendant or its products and services; and
  - (e) otherwise competing unfairly with Beachbody or Mr. Kalev or otherwise infringing upon or misappropriating Beachbody's or Mr. Kalev's intellectual property or other rights in any manner whatsoever.
- 2. That the Court find that Defendant is infringing Beachbody's Copyrighted Image and is competing unfairly with Beachbody and Mr. Kalev.
  - 3. That the Court find that Defendant violated 42 Pa. Stat. § 8316.
- 4. That the Court order Defendant to deliver up to Beachbody for destruction, at the Defendant's expense, catalogs, web site materials, literature, brochures, packaging, signs, promotional materials, advertisements and other communications to the public in the possession or under the control of Defendant, including any and all printed advertisements, and any other

material or any representations that contain the Copyrighted Image, including Defendant's Advertisement.

- 5. That the Court order Defendant to account for and pay to Beachbody the damages to which Beachbody is entitled as a consequence of Defendant's infringement of Beachbody's Copyrighted Image and Defendant's unfair competition.
- 6. That the Court order Defendant to account for and pay to Mr. Kalev the damages to which Mr. Kalev is entitled as a consequence of Defendant's unfair competition and unauthorized use of Mr. Kalev's image and likeness.
- 7. That the Court order Defendant to account for and pay over to Beachbody all profits received by Defendant from its unlawful acts or otherwise award the maximum in statutory damages of \$150,000 as a result of Defendant's willful copyright infringement, whichever is greater.
- 8. That the Court enter an order placing reasonable but effective restrictions on the future transactions and activities of Defendant so as to prevent fraud on the Court and so as to ensure the capacity of Defendant to pay, and the prompt payment of, any judgment entered against Defendant in this action.
- 9. That the Court award Beachbody and Mr. Kalev their compensatory, incidental, and consequential damages.
  - 10. That the Court award Beachbody and Mr. Kalev enhanced and treble damages.
- 11. That the Court award Beachbody and Mr. Kalev their interest, reasonable attorneys' fees and the costs of this action.
  - 12. That the Court grant Plaintiffs such other relief as is just and proper.

## **JURY DEMAND**

Pursuant to Fed. R. Civ. P. 38(b), Plaintiffs Beachbody, LLC and Sagi Kalev hereby demand a jury trial on all issues triable by jury.

Dated: January 22, 2015 By: /s/ Camille M. Miller

Camille M. Miller (PA Bar No.: 79670) Melanie A. Miller (PA Bar No.: 73499) J. Trevor Cloak (PA Bar No.: 207981) COZEN O'CONNOR 1900 Market Street Philadelphia, PA 19103

Tel. 215-665-7273

Attorneys for Plaintiff, Beachbody, LLC

## Exhibit A

# PHARMACEUTICAL GRADE

# SYNTHOBOLIC

Pro-Anabolic Muscular Site Enhancement

**CONTENTS: 100ml** 

## Exhibit B

fi.

Is There a Report About You!? Watch This 3 Minute Video!

Ripoff Report | Complaints Reviews Scams Lawsuits Frauds Reported. File your review. Consumers educating consumers.™

By consumers, for consumers,,

Help

Don't let them get away with it.® Let the truth be known!™



Register to File a Report Login

Reports filed: 1.901.553

FILE A

Update

Latest Reports

Consumer Resources

Consumers Say Thank You

Directory

Estimated money Consumers saved since 1998 \$15,560,160,413.00

Corporate Advocacy

Company Name or Report #

Submit Que

REPORT

Home

a Report

Total Visits since 1998: 8,891,520,236

Ripoff Report protects consumers first amendment right to free speech

Review Latest Reports

Advanced Search Browse Categories

MYBUYS

Deliver personalized offers. Bring shoppers back to buy.



Report: #1073382

## Complaint Review: Richard J Wyant

#### Related Reports

AACS American Academy of Cosmetic Surgery Dr. Michael Will Michael J. Will AACS is a DISGRACE Obicago Illinois

Allen J Ullman & Jason Chafetz Liars, Scammers, Threves'" Ashburn Virginia

Richard Sige Vega Dj Whiteowl, Richard Sipe, Vega Con artist, Liar, Theif ((IREDACTED))) LAS Vegas, Miami, New York, San Diego Arizona Nationwide

Linebarger Goggan Blair & Sampson J, Kelly Burnette Collecting a fictiouss debt Jackschville Florida

eciuo com - Richard Swerdlov eRealfstate Holdings, LLC Ripped Off By Cendo com and Richard Swerdlov, Cendo com Leads Are Oversold Garbace, Mami Beach, FL Flonda Cendo.com - Richard Swerdlow

Modern Geek Media - Carl Lore Carl J. Lore Convicted Felon - Carl Lore = BEWARE! Williamsville New York

Burt and Associates R J Scott Burt & Threaten to get payment for debt not owed. Dallas Texas

LEGAL FILER, LEGAL SERVICE. PARALEGAL, ER 911 ER HELP, STOP EVICTION, EVICTION HELP STAY HI YOUR HOME, FILE PAPER WORK, LEGAL, SERVICES. CRAIGS LIST SCAMMER CRAIGSLIST SPAMMER BAIT AND SWITCH, THEIF LIAR RUD! RACIST EVICTION, SHERRIFFS DEPARTMENT, MOTION TO GUIT MOTION TO SQUASH, VACATE PREM DESALOJO DE AYUDA, FILES MOCIONES DE HUELGA NO BUENO " RIP OFF \$ 350 POR MES estatA, Richard Santos, EVICTION HELP, LEGAL PILER, LEGAL SERVICE, PARALEGAL, ER 911 ER HELP, STCP EVICTION EVICTION HELP, STAY IN YOUR HOME, FILE PAPER WORK LEGAL SERVICES CRAIGS LIST SCAMMER CRAIGSLIST SPAMMER, BAIT AND SWITCH, THEIR LIAR RUDE.
RACIST, EVICTION, SHERRIFFS
DEPARTMENT MOTION TO QUIT.

Or, Richard Repass Psychiatrist falsely diagnosed sister to steal her

MOTION TO SQUASH VAN NUYS

Submitted: Tue, August 06, 2013 Updated: Tue, August 06, 2013 Reported By: Truthbetold - LA California

Richard J Wyant 324 N. Bayshore Dr. Columbiana, Ohio

Phone: Web: Angelo Sorice on Amazon Category: Drug Manufacturers



Richard J Wyant Muscle Labs USA, legalsteroid-

reviews.com,OrderLegalSteroids.com,Angelo sorice seller on amazon, Richard Wyant selling dangerous fraudulent supplements under many business names. Columbiana Ohio

- \*General Comment: False Claims About Richard Wyant
- \*Author of original report: Bad person
- \*REBUTTAL Individual responds: Richard J. Wyant Columbiana Ohio

8+1 Recommend this on Google REBUTTAL BOX™ | Respond to this Report! Aribitrate & Set Record Add Rebuttal to this Report Straight File New Report Repair Your Reputation







Advertisers above have met ou strict standards for business conduct



neviborn baby Hutchinson, Minnesota

James J Hughes Cancellation of National Geogtraphic, Internet

Featured Ripoff Reports



Bill O'Reilly Fox News about Ripoff Report

\*UPDATE January 1, 2015 INVESTIGATION UPDATE Sac County DA Ben Smith Fails to identify false statements, fails to support accusations w/ clarifications vague sloppy misleading. Prosecutorial Misconduct



Ben Smith Sac County Ben Smith Sac County lowa Attorney prosecutorial misconduct, improper relationship with star witnesses to knowingly lie. Tracey Richter Roberts falsely convicted overwhelmic convicted, overwhelming evidence leads to estranged husband Michael Roberts, Rexxfield failed polygraph, witness intimidation, evidence tampering. Iowa Division of Criminal Investigation Rexxfield failed corruption.



Free Tracy Richter

A Son's Plea: "We are humbly asking for your help in our quest for justice for my mother, Tracey Richter. She was falsely convicted of murder in 2011 for defending her family in a defending her family in a house invasion that occured in 2001."

The New "Digital Extortion" is there a Ripoff Report on you?



Reputation

Richard Wyant runs one of the biggest international? when it comes to the supplement industry. He "manufactures" fraudulent products (most likely out of his living room). He simply slaps a poorly crafted label on a bottle of who knows what. Not only is this extremely dangerous to the consumer its extremely illegal. But I guess its not a big surprise coming from an individual with a record that looks like this:

According to public record, he has

53 court records,1 felony,11 misdemeanors, domestic violence 2005, felony threft by deception 2001 i mproper handling of firearm 2000, having weapon under disability 2000, 5 seperate theft charges 1996 in 1995 2 felony counts trafficking in drugs and 2 felony counts trafficking in counterfeit controlled substances. complicity 1994. agravated burglary 1994. civil judgement 2012 ( Mahoning County Ohio Court Records), judgement in Youngstown Ohio court for \$134. [continued Watch This 3 Minute Video!

Ripoff Report About you?

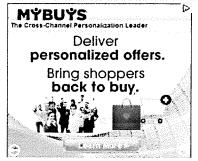
Ripoff Report A business' first line of defense on the Internet.

If your business is willing to make a commitment to customer satisfaction Click here now..

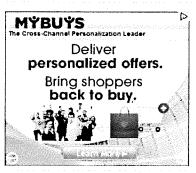
Does your business have a bad reputation? Fix it the right way Corporate Advocacy Program™

SEO Reputation Management at its best!











### Report Attachments:

...00 in 2009

Domestic Violence also in 1995 in Columbiana County,

Reposts of Richard J Wyants scams can be found all over the internet, It is a wonder why this man with no morals or regard for others is not behind bars as we speak. He has completely desimated the good names of credible companies. Here are just a few of the sites he his affiliated with and sells his conterfited products

Stav away from muscle labs USA

Orderlegalsteroids.com

Angelo sorice seller on amazon

Muscle chem labs

Militant muscle

Muscle superstore on amazon

And there are many more. I have also found reports of Richard Wyant ripping off and impersonating other popular companys as well. Here is the kicker, this a\*\* hole has web site ( url http://thewyantfoundation.com/) with a header "Making a Difference feels good", Well Wyant , your making a difference alright but not the kind of difference to be proud of. On his web site he states "Helping individuals self improve or take action on an idea concept or vision is his true passion" Just like he does right? He takes a true passion in creating fradulant products and taking the hard eamed money of individuals in echange for a bottle of...well we dont know whats in the bottles do we

THIS MAN BELONGS BEHIND BARS!! Please contact me you would like more information please.

This report was posted on Ripoff Report on 03/05/2013 01 07 AM and is a permanent record located here http://www.ripoffreport.com/r/Richard-J-Wyant-/Collumbiana-Ohio-44408/Richard-J-Wyant-Muscle-Labs-USAlegal-steroid-reviewscomOrderLegalSteroidscomAngelo-1073382. The posting time indicated is Arizona local time. Arizona does not observe daylight savings so the post time may be Mountain or Parific depending on the time of year.

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Ripoff Reports



AT &T Juan C Return policy



Eashion ista boutique Ro \*\*\*\*\*\*RIP OFF

BUSINESS Lake Charles Louisiana



company is NOT a Real Company Fortworth



Superior Auto LIERS sell runk and lie Bryan Chio

- Jim Robinson ((Redacted))

admin@printshopsource.com 2167 Stringtown Road Syste 1.17 Grove

43123admin@printshcpsource.com DBA Jim Robinson Jim Robin Hijacks parts to a machine that he invoiced us for and got paid for. Grove City Ohio



Academy of Cosmetic Surgery Dr. Michael Will CS is a DISGRACE Chicago flinois

Allen J Uliman & Jason Chafetz Liars, Scammers, Thieves!! Ashburn Virginia

Chana Bulldogs Jessica Bliss Jessica Louise Southern Castaways

rescue, Jessica Bliss, Jessa Lou, Edi Bliss Jessica Teaque, "Jessica Bliss / Cadiz Kentucky Actually focated in Cadiz, Kentucky but advertised on Adopt-a-Pet under New Canash, CT, Previously Convicted felon, con artist & uses her foster kids as pawns with multiple aliases, scams people out of buildogs (as rescues) and reselfs/brokers them! Cadiz



The Dancing Tree The Dancing Tree of Wimberley Summiffit150 Susan Renee

Susan Houchin of The Jansing Tree of 460 Summit Loop in Wimberley is a Drug User, a Fraud and a Theif Wimberley Texas



File a Rebuttal Is There ale Rac Rap Arbout You!? Wast Staded Whote Video! Arbitrate Remove Reports? No! Better yet! Arbitrate to set the record straight! REBUTTALS & REPLIES Updates & Rebuttals Author Consumer Employee/Owner

#1 General Comment

### **False Claims About Richard Wyant**

AUTHOR: Maximus McCullough - ()

SUBMITTED Sunday January 19 2014

I work with Richard Wyant every day and I have to laugh when I look at this rediculas report. I have an idea about who these people could be fileing the report, in fact I have more than an idea but who really cares? The only thing that I found interesting in this reports was that fact that no one is claiming to be ripped off? I mean really if Richard Wyant owned OrderLegalSteroids.com which I know he DONT, I am the developer, where are the customer reports saying the were ripped off? I just see a couple cry babies here that I totally demolished on the internet.

Yes I am the devloper of OrderlegalSteroids.com I dont mind you giving Rich the credit he is my best friend but its my name on the bottom of this site. This website alone makes over \$10 million a year and I am glad to see that all we have on Ripoff report are jealous compeditors that cry in their pillows every night. Poor babies! Oh yeah and the russian hackers you guys sent, that was not a good idea and a waste of money on your part. Why cant you guys just make an honest living and provide your customers with the best LEGAL STEROIDS and supplemnts like we do?

Oh I know the answer to that question, you don't have them. Why were we banned from google? Well lets just say when you provide the most powerful suppleements known to man they get a little skeered. Anyone wishing to confirm my identity can go to the bottom of the website and see my link. I am Maximus McCullugh and I love OrderLegalSteroids.com I take the supplemnts every day. You can look up my pictures on the internet and see what they do for me then look up the pictures of greg gavin the owner of swess pharma and get ready to laugh. Ok well I have said enough and had my fun. I was a little bored so I decided to write up this little article. I hope you enjoyed it! PEACE!

### Report Attachments:

Respond to this report! | File a Rebuttal

#2 Author of original report

### Bad person

AUTHOR: Truthbetold - ()

SUBMITTED Friday November 22, 2013

Any one looking to do business with this man beware! He is not a good person and he will put a knife in your back for a buck!

The information stated in this post is all correct. The fact that he started the "Wyant Foundation" is just sickning to me. Maybe he started it to cover up the trail of destruction he leaves in his path. If you want the truth, Seek the truth and you will find it- III be darned if this man makes a fool of me, back in the day men like you could get away with such things as this, but not in todays world son.

Respond to this report! File a Rebuttal

#3 REBUTTAL Individual responds

### Richard J. Wyant Columbiana Ohio

AUTHOR: RJW Business Development - ()

SUBMITTED Thursday September 05 2013

I am Richard Wyant of Columbiana Ohio. Your Information Is incorrect and inaccurate. I am shown in the image with my 9 year old daughter. I do not own any



ZANO kickstarter scam & vaporwate et actually fly Internet



Amanda (((REDACTED))) www.americanbyacparts.com Bestouyheatingandairconddionning and americanhyacparts, com wrong advertizing with no refund Upland

Quality One Exteriors LLC Q1E Will Steel Your Money!



George Boules

George9785George Boulos Nemer EBAY STALKER Blaine Washington



Jngi Jürgen Gerner ABC Real Estate Tamarindo Costa Rica Real Estate Brokers Agents Scam,

Watch Out for ABC Realty!

Vega Di Whiteowl Richard Sipe Vega Con artist Liar, Theif

(((REDACTED))) LAs Vegas, Miami, New York, San Diego, Arizona



Ideal America Illegally Towed

completely wrecked it in the process. Stafford Texas



Retrievers Warren Retrievers

Guardian Angel Service Dogs GASD Dan Warren Service Dogs SDWR.crg Expensive Pets. Service Dogs by Warren Retrievers Madison



National Tax Experts REVIEW: Experts dedicated to

Customers are lifeblood of any business and single most valuable asset! National Tax Experts 100% quaranteed customer experience with customer outreach service that independently unbiasedly arbitrates customer problems\_finishing cases clearing up misunderstandings & returning money, on a case by case basis. National Tax Experts also offers wide variety of professionals & programs assisting clients navigate difficult waters of IRS codes.
National Tax Experts recognized by Ripoff Report Verified™ as a safe business service,



Paradiam Verified Safe, Paradigm

residential Mental H Health, & Chemical Dependency treatment for adolescents. Certified by Joint Commission, industry gold standard of treatment, Paradigm Malibu receives positive rating for

of the businesses mentioned in your post Alam respectfully (setueshing you up date) your information to protect the innocent in this matter (such as myself and my 9 year old daughter depicted in the photograph).

I am further requesting removal of the image of the minor child, simply out of decency. I am in fact affilited with "The Wyant Foundation". A simple youtube or google search will show you many of the charitable events we take part in within our

I am in the business of website development, investments, online marketing and business development. I do not "own" any of the businesses which I am contracted to design or build. I also buy and sell domain (website) names and currently hold over 2500 within our archives.

I have no understanding of the basis of this post about me, nor is any of the information accurate (except my name and address). I am respectfully requesting your post be modified or updated to make your point. I personally feel the image of a child is "Classless", but readers will see that, so it is likely in my advantage that the photo remains:)

Thanks for reading, Richad J. Wyant

### Report Attachments:

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Report & Rebuttal

Respond to this File a Rebuttal

Also a victim?

Repair Your Reputation! Get Started

File a Report

Arbitrate

Remove Reports?

No! Better yet! Arbitrate to set the record straight!

Corporate Advocacy Business
Remediation & Custemer
Satisfaction Frogram aprogram that
benefits consumers, assuring them
of complete satisfaction &
confidence when deling business
with a member business,
Recontined by Ricott Report
Verified <sup>24</sup> as a safe business
service.



Global
Timeshate
Sales Vacation
Property
Network We
paid a fee to
have this

company self our timeshares and 3 years later NOTHING! AND now they are asking for a Global Timeshare Sales. Vacation Property Network Internet



Magills towing Mark Magill Mortifying theft by deception bulkes violantes Papakin

Pennsylvania



ecosaleuk.co.uk David Blake Sent me wrong pay of shees from China and refused to take them back and give me refund, however "Judy" offered me 15 % compensation. He have said wich country he fixed in and that the country custom was so strict that they could take back the shoes. UK Internet



Katarina
Connors, Kati
Connors Drone
sales - Cash
Only Biz from
home Ex Pilot Swindles Drone

Swindles Drone
Sales - Cash Only biz - BUYER
BEWARE Kansas City Missouri



American ban corp fold me if I bought a vanilla reload card and bave her the numbers on the

6000 for my 200 Michigan Internet



http://www.buvlikesmedia.com.Be verv.cauticus.when.using.this company. Product not as advertised? Internet

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